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 of America, LLC*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: VOLKSWAGEN “CLEAN DIESEL”)
 MARKETING, SALES PRACTICES, AND)
 PRODUCTS LIABILITY LITIGATION)
 _____)
 This Document Relates to: Securities Actions)
City of St. Clair Shores, No. 15-6167)
Travalio, No. 15-6168)
George Leon Family Trust, No. 15-6166)
Charter Twp. of Clinton, No. 16-190)
Wolfenbarger, No. 16-184)

MDL No. 2672 CRB (JSC)

**STIPULATION AND ORDER
 CONCERNING BRIEFING
 SCHEDULE FOR SECURITIES
 PLAINTIFFS’ MOTION TO LIFT
 PSLRA DISCOVERY STAY**

Hearing: June 17, 2016
 Time: 10:00 a.m.
 Courtroom: 6
 The Honorable Charles R. Breyer

1 WHEREAS, on April 26, 2016, Lead Plaintiff for the Securities Actions, the
2 Arkansas State Highway Employees' Retirement System ("ASHERS"), filed a Motion for Partial
3 Modification of the PSLRA Discovery Stay (Docket No. 1460) (the "Motion");

4 WHEREAS, counsel for ASHERS and counsel for Defendants Volkswagen AG,
5 Volkswagen Group of America, Inc. (including Volkswagen Group of America, Inc. d/b/a
6 Volkswagen of America, Inc.), Audi of America, LLC, Michael Horn, Mark McNabb, Scott
7 Keogh, Jan Bures and Martin Winterkorn ("Defendants"), through their undersigned counsel,
8 have agreed that any opposition(s) to the Motion shall be filed by May 27, 2016, and that any
9 reply shall be filed by June 10, 2016; and

10 WHEREAS, the parties have not previously requested an extension of any
11 deadlines associated with the Motion.

12 NOW, THEREFORE IT IS HEREBY STIPULATED AND AGREED, by and
13 among the parties hereto, that any opposition(s) to the Motion shall be filed by May 27, 2016,
14 and any reply shall be filed by June 10, 2016.

15 Dated: April 29, 2016

16 Respectfully submitted,

17 /s/ Robert J. Giuffra, Jr.

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*Attorneys for Lead Plaintiff ASHERS and Lead
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* * *

PURSUANT TO STIPULATION, IT IS SO ORDERED

DATED: May 2, 2016



CHARLES R. BREYER
United States District Judge